

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**SECURITIES AND EXCHANGE  
COMMISSION,**

**Plaintiff,**

**V.**

**ROY HILL, ERIC N. SHELLY,  
CLEAN ENERGY TECHNOLOGY  
ASSOCIATION, INC., and  
FREEDOM IMPACT CONSULTING,  
LLC,**

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**CIVIL ACTION NO. 6:23-cv-00321**

## Defendants.

**DEFENDANT ROY HILL’S UNOPPOSED MOTION FOR WITHDRAWAL AND  
SUBSTITUTION OF COUNSEL**

Roy Hill (“Mr. Hill”) files this Unopposed Motion for Withdrawal and Substitution of Counsel, and in support, would respectfully show as follows:

1. The following attorney currently represent Mr. Hill in this case:

Gene R. Besen  
Texas Bar No. 24045491  
[gbesen@bradley.com](mailto:gbesen@bradley.com)  
**BRADLEY ARANT BOULT CUMMINGS LLP**  
1445 Ross Avenue, Suite 3600  
Dallas, Texas 75202  
Telephone (214) 257-9785  
Facsimile (214) 934-8787

2. Mr. Hill desires to have this attorney withdraw and to have the following attorney substitute in as lead counsel of record for Defendant:

David W. Klaudt  
State Bar No. 00796073  
[David.Klaudt@gtlaw.com](mailto:David.Klaudt@gtlaw.com)  
**GREENBERG TRAURIG, LLP**  
2200 Ross Avenue, Suite 5200

Dallas, Texas 75201  
Telephone: (214) 665-3600  
Facsimile: (214) 665-3601

3. Mr. Christopher L. Tritico and Mr. Ron Rainey will remain counsel of record for Mr. Hill.

4. This substitution is not requested for delay but so that justice may be done.

5. Granting this substitution will not result in prejudice to any party or substantially affect any existing deadlines.

WHEREFORE, Defendant respectfully asks the Court for an order withdrawing and substituting counsel as describe above and for such other and further relief to which he may be entitled.

Respectfully submitted,

/s/ David W. Klaudt

David W. Klaudt

State Bar No. 00796073

[klaudtd@gtlaw.com](mailto:klaudtd@gtlaw.com)

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**ATTORNEY FOR DEFENDANT ROY HILL**

**AGREED:**

/s/ Gene R. Besen

Gene R. Besen

Texas Bar No. 24045491

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**CERTIFICATE OF CONFERENCE**

I, David W. Klaudt, hereby certify that on the 8th day of December, 2023, I conferred with Jennifer Reece, counsel for Plaintiff, and Dennis Lynn Roosien Jr., counsel for Receiver, and they have indicated they are unopposed to the relief request in this Motion.

/s/ David W. Klaudt

David W. Klaudt

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on all parties that have appeared through the Court's electronic filing system on December 8, 2023.

/s/ David W. Klaudt

David W. Klaudt